

1 Lexi J. Hazam (SBN 224457)
2 *lhazan@lchb.com*
3 LIEFF CABRASER HEIMAN
& BERNSTEIN LLP
4 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-356-1000

5
6 Christopher A. Seeger (*pro hac vice*)
cseeger@seegerweiss.com
7 SEAGER WEISS LLP
55 Challenger Road, 6th Floor
8 Ridgefield Park, NJ 07660
Telephone: 973-639-9100

9
10 Previn Warren (*pro hac vice*)
MOTLEY RICE, LLC
11 401 9th Street NW, Suite 630
Washington, DC 20004
12 Telephone: 202-386-9610

13 *Plaintiffs' Co-Lead Counsel*

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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
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19 IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
20 PRODUCTS LIABILITY LITIGATION

21 No. 4:22-md-03047-YGR

22 MDL No. 3047

23
24 This Document Relates to:
ALL ACTIONS

25
26 **STIPULATION AND [PROPOSED] ORDER**
EXTENDING SCHEDULE CONCERNING
PROPOSED PRESERVATION ORDER

27
28 Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned
counsel, hereby stipulate and respectfully request that the Court extend the deadlines that were
adopted with respect to the Preservation Order [ECF Nos. 386, 390], as follows:

1 WHEREAS, on October 13, 2023, the parties filed a joint discovery letter summarizing
2 the MDL and the pending disputes and proposing a schedule for further negotiations and
3 resolution of disputes over a proposed Preservation Order [ECF No. 386];

5 WHEREAS, on October 17, 2023, the Court adopted the parties' proposed meet and
6 confer schedule with respect to the Preservation Order [ECF No. 390], as follows:

- 7 1. October 20: Defendants provide Plaintiffs with an updated proposed
8 Preservation Order;
- 9 2. Between October 21-31: Parties meet and confer to the extent necessary to
10 clarify Defendants' revisions;
- 11 3. November 1: Plaintiffs provide Defendants with a redline to the updated
12 proposed Preservation Order;
- 13 4. Between November 2-10: Parties meet and confer regarding outstanding
14 disputes; and
- 15 5. November 15: Parties submit a joint status report in which they either offer a
16 joint proposal for briefing the remaining disputes or submit competing
17 proposals with respect to briefing.

17 WHEREAS, on October 20, 2023, Defendants provided Plaintiffs with an updated
18 proposed Preservation Order, together with information regarding Defendants' data sources and
19 tools; and

20 WHEREAS, Plaintiffs requested additional time to respond to Defendants, and
21 Defendants agreed, provided that other dates in the schedule be extended.

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO
23 THE COURT'S APPROVAL, THAT THE SCHEDULE ADOPTED AT ECF No. 390 IS
24 MODIFIED AS FOLLOWS:

- 25 1. November 13: Plaintiffs provide Defendants with a redline to the updated
26 proposed Preservation Order;
- 27 2. Between November 14-December 6 (excluding the week of Thanksgiving):
28 Parties meet and confer regarding outstanding disputes; and

1 3. December 11: Parties submit a joint status report in which they either offer a
2 joint proposal for briefing the remaining disputes or submit competing
3 proposals with respect to briefing.

4 Dated: November 11, 2023

5 */s/ Christopher A. Seeger*
6 Christopher A. Seeger, *pro hac vice*
7 **SEAGER WEISS LLP**
8 55 Challenger Road, 6th Floor
9 Ridgefield Park, NJ 07660
10 Telephone: 973-639-9100
11 cseeger@seegerweiss.com

12 Lexi J. Hazan (SBN 224457)
13 **LIEFF CABRASER HEIMAN**
14 **& BERNSTEIN LLP**
15 275 Battery Street, 29th Floor
16 San Francisco, CA 94111-3339
17 Telephone: 415-356-1000
18 lhazan@lchb.com

19 Previn Warren, *pro hac vice*
20 **MOTLEY RICE, LLC**
21 401 9th Street NW, Suite 630
22 Washington, DC 20004
23 Telephone: 202-386-9610
24 pwarren@motleyrice.com

25 *Plaintiffs' Co-Lead Counsel*

26 **COVINGTON & BURLING LLP**

27 */s/Ashley M Simonsen*
28 Ashley M. Simonsen, SBN 275203
1 COVINGTON & BURLING LLP
2 1999 Avenue of the Stars
3 Los Angeles, CA 90067
4 Telephone: (424) 332-4800
5 Facsimile: + 1 (424) 332-4749
6 Email: asimonsen@cov.com

7 Phyllis A. Jones, *pro hac vice*
8 Paul W. Schmidt, *pro hac vice*
9 COVINGTON & BURLING LLP
10 One CityCenter
11 850 Tenth Street, NW

1 Washington, DC 20001-4956
2 Telephone: + 1 (202) 662-6000
3 Facsimile: + 1 (202) 662-6291
4 Email: pajones@cov.com
Email: pschmidt@cov.com

5 Emily Johnson Henn (State Bar. No. 269482)
COVINGTON & BURLING LLP
6 3000 El Camino Real
7 5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306
8 Telephone: + 1 (650) 632-4700
Facsimile: +1 (650) 632-4800
Email: ehenn@cov.com

9 Isaac D. Chaput (Bar No. 326923)
10 COVINGTON & BURLING LLP
11 Salesforce Tower
12 415 Mission Street, Suite 5400
13 San Francisco, California 94105
Telephone: + 1 (415) 591-6000
14 Facsimile: + 1 (415) 591-6091
Email: ichaput@cov.com

15 Gregory L. Halperin, *pro hac vice*
16 COVINGTON & BURLING LLP
620 Eighth Avenue
17 New York, NY 10018
Telephone: + 1 (212) 841-1000
18 Facsimile: +1 (212) 841-1010
Email: ghalperin@cov.com

19 *Attorney for Defendants Meta Platforms, Inc.*
20 *f/k/a Facebook, Inc.; Facebook Holdings,*
21 *LLC; Facebook Operations, LLC; Facebook*
22 *Payments, Inc.; Facebook Technologies, LLC;*
23 *Instagram, LLC; Siculus, Inc.; and Mark Elliot*
24 *Zuckerberg*

25

26

27

28

1 **KING & SPALDING LLP**

2 /s/ Geoffrey M. Drake
3 Geoffrey M. Drake
4 King & Spalding LLP
5 1180 Peachtree Street, NE, Suite 1600
6 Atlanta, GA 30309
7 Telephone: + 1 (404) 572-4600
8 Facsimile: + 1 (404) 572-5100
9 Email: gdrake@kslaw.com

10 **FAEGRE DRINKER LLP**

11 /s/Andrea Roberts Pierson
12 Andrea Roberts Pierson
13 Faegre Drinker LLP
14 300 N. Meridian Street, Suite 2500
15 Indianapolis, IN 46204
16 Telephone: + 1 (317) 237-0300
17 Facsimile: + 1 (317) 237-1000
18 Email: andrea.pierson@faegredrinker.com

19 *Attorneys for Defendants TikTok Inc. and*
20 *ByteDance Inc.*

21 **MUNGER, TOLLES & OLSEN LLP**

22 /s/ Jonathan H. Blavin
23 Jonathan H. Blavin, SBN 230269
24 MUNGER, TOLLES & OLSON LLP
25 560 Mission Street, 27th Floor
26 San Francisco, CA 94105-3089
27 Telephone: (415) 512-4000
28 Facsimile: (415) 512-4077

29 Rose L. Ehler (SBN 29652)
30 Victoria A. Degtyareva (SBN 284199)
31 Ariel T. Teshuva (SBN 324238)
32 MUNGER, TOLLES & OLSON LLP
33 350 South Grand Avenue, 50th Floor
34 Los Angeles, CA 90071-3426
35 Telephone: (213) 683-9100
36 Facsimile: (213) 687-3702

37 Lauren A. Bell, *pro hac vice*
38 MUNGER, TOLLES & OLSON LLP
39 601 Massachusetts Ave., NW St.,
40 Suite 500 E

1 Washington, D.C. 20001-5369
2 Telephone: (202) 220-1100
3 Facsimile: (202) 220-2300

4 *Attorneys for Defendant Snap Inc.*

5 **WILSON SONSINI GOODRICH & ROSATI**
6 **Professional Corporation**

7 /s/ Laura Gallo White

8 Lauren Gallo White
9 Wilson Sonsini Goodrich & Rosati
lwhite@wsgr.com
10 Samantha A. Machock
smachock@wsgr.com
11 One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099

12 Brian M. Willen
13 Wilson Sonsini Goodrich & Rosati
bwillen@wsgr.com
14 1301 Avenue of the Americas, 40th Floor
15 New York, New York 10019
16 Telephone: (212) 999-5800
17 Facsimile: (212) 999-5899Christopher Chiou
18 Wilson Sonsini Goodrich & Rosati
cchiou@wsgr.com
633 West Fifth Street
19 Los Angeles, CA 90071-2048
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

20 **WILLIAMS & CONNOLLY LLP**

21 /s/ Ashley W. Hardin

22 Ashley W. Hardin, *pro hac vice*
ahardin@wc.com
23 Joseph G. Petrosinelli, *pro hac vice*
jpetrosinelli@wc.com
24 680 Maine Avenue, SW
25 Washington, DC 20024
26 Tel.: 202-434-5000

MORGAN LEWIS & BOCKIUS, LLP

/s/ Stephanie Schuster

Stephanie Schuster
stephanie.schuster@morganlewis.com
1111 Pennsylvania Ave.
NW Washington, DC 20004-2541
Tel.: 202.373.6595

Brian Ercole
brian.ercole@morganlewis.com
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416

Yardena R. Zwang-Weissman
yardena.zwang-weissman@morganlewis.com
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238

*Attorneys for Defendants YouTube, LLC,
Google LLC, and Alphabet Inc.*

IT IS SO ORDERED.

DATED:

**The Honorable Peter H. Kang
United States Magistrate Judge**

SIGNATURE CERTIFICATION

Pursuant to Civ. L. R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

Dated: November 11, 2023

/s/ Christopher A. Seeger

Christopher A. Seeger

SEEGER WEISS LLP

55 Challenger Road, 6th Floor

Ridgefield Park, NJ 07660

Telephone: 973-639-9100

cseeger@seegerweiss.com